

REMARKS

Reconsideration of the above-identified application is respectfully requested.

Claims 1 and 8–14 were rejected as unpatentable over Nilssen in view of Jungreis et al. The Examiner asserts the following.

With respect to claim 12, Nilssen discloses in electronic circuit for operating a high-pressure lamp in at least two modes, a first half bridge (Qa1, Qa2) and a second bridge (Q1b, Qb2) connected in parallel and the improvement comprising: second means for operating the first half bridge, *whereby the first half bridge and the second half bridge operate independently of each other* [emphasis added]

It is respectfully submitted that there is no support in the Nilssen patent for the italicized assertion. The Examiner refers to column 4, lines 61–68, reproduced in part below.

“The full-bridge inverter of FIG. 1 actually consists of two half-bridge inverters, either of which can be made to operate independently of the other, *as long as the other is maintained in a non-operative state.* [emphasis added]

(1) How can operation be “independent” when the last clause in the sentence imposes a dependency (as long as ...)? It is respectfully submitted that the sentence does not support the Examiner’s interpretation.

(2) An inoperative state is not independent operation. How can non-operation be operation? One of ordinary skill in the art, even one not skilled in an art, does not consider “off” or “non-operating” as “on” or “operating.” The simple request of asking someone to turn the lights off in a room becomes meaningless, given the Examiner’s interpretation of the Nilssen patent.

(3) As explained in column 4, lines 1–20, inverter (Qa1 and Qa2) oscillates first and then inverter (Qb1 and Qb2) is triggered. Once triggered, the inverters are locked in a feedback loop. “[T]ransistor-pair Qb1/Qb2 starts to get involved in the positive feedback cycle and thereby in the inverter action.” Getting “involved” is not independent operation.

(4) If one does not trigger inverter (Qb1 and Qb2), then one has a **single half-bridge circuit**, not two half-bridges operating independently. The Examiner’s interpretation that having one half-bridge not operating is independent “operation” is simply not supported by the language of the Nilssen patent, such as it is.

(5) If one does not trigger inverter (Qb1 and Qb2), then one must switch output terminals; viz. use terminals JC and JXa instead of JXa and JXb when using two half-bridges [column 5, lines 4-15]. This is not independent operation.

(6) By analogy, some automobiles have been made with an engine that shuts off fuel injection to some cylinders to reduce fuel consumption under light load. Does one now have two engines "operating" independently? On a railroad, a locomotive that is being towed to where it is needed has its engine shut off. Is the locomotive "operating?" The railroads do not seem to think so. The towing is called "dead heading."

The Examiner then asserts that the Jungreis et al. patent discloses a filter coupled to the first half bridge circuit and a resonant circuit coupled to the output of the second half bridge circuit.

(1) The Jungreis et al. patent does not use the word "resonant." What is the basis for the Examiner's allegation to the contrary?

(2) The Jungreis et al. patent is concerned with an inductor having a value related to the pulse width modulation of the current. See equations (1) and (2) in column 4 of the Jungreis et al. patent. It is respectfully submitted that this **teaches away from** a resonant circuit.

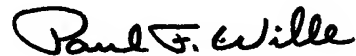
(3) The Jungreis et al. patent also discloses a transformer output and operating the half bridges 180° out of phase. What is the basis, other than applicant's claims, for selecting an inductive filter and ignoring other disclosures? The alleged rationale ("*in order to generate a pulse width modulation output voltage having a distorted output voltage waveform and compensate for the distorted output voltage waveform response to the ripple current*") has nothing to do with the claimed invention. It is merely a re-hash of what was hoped to be accomplished by the invention disclosed in the Jungreis et al. patent. It is respectfully submitted that there is no basis for the combination other than applicant's claims, which is improper; *In re Rouffet*, 47 USPQ2d 1453, at 1457 (Fed. Cir. 1998).

Claims 2-7 were rejected as unpatentable over Nilssen in view of Jungreis et al. and other prior art. None of the other prior art overcomes the problems discussed

above. All of the other prior art contribute to the problem that there is no basis for the combination other than applicant's claims.

In view of the foregoing amendment and remarks, it is respectfully submitted that claims 1-14 are in condition for allowance and a Notice to that effect is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, reading "Paul F. Wille". The signature is written in a cursive, flowing style.

Paul F. Wille

Reg. No. 25,274

Attorney for Applicant

Philips Intellectual Property & Standards
P.O. Box 3001
Briarcliff Manor, N.Y. 10510-8001
(914) 333-9634